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May 17, 2023

**VIA ECF**

The Honorable Ona T. Wang  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St. Room 20D  
New York, NY 10007-1312  
(212)-805-0260

Re: *Garmashov v. United States Parachute Association, Inc.*  
Case no.: 1:21-cv-04917-JGK-OTW

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Dear Judge Wang:

We represent the Defendant, the United States Parachute Association, Inc. (“USPA”) and we write to provide a status update to the Court, as required by the May 3, 2023 Order (ECF Doc. No. 78). We understand the Court has requested a joint status letter, but we have been unable to agree with Plaintiff’s counsel on the language of the letter.

The parties met and conferred to try and resolve the Plaintiff’s pending motion (ECF Doc. No. 65), but were unsuccessful. Because that motion is fully briefed, we request the Court decide the motion on the papers.

Plaintiff does not consent to the settlement agreement (ECF Doc. No. 77) being sealed, but Defendant wishes it to be sealed. To that end, we propose a briefing schedule. May 31, 2023 for Defendant to file its motion to seal. Plaintiff to oppose by June 16, 2023 and Reply due June 23, 2023.

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Honorable Ona T. Wang  
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We thank the Court for its attention to this matter.

Respectfully Submitted,

*/s/ Kenneth A. McLellan*

Kenneth A. McLellan

cc: **VIA ECF**

Mr. Eric M. Underriner, Esq.

Mr. Alex B Kaufman, Esq.